

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JOHN INMAN (AIS# 234821),

*

Plaintiff,

*

V.

* 2:05-CV-526-T

STATE OF ALABAMA, ET AL.

*

Defendants.

*

MOTION TO EXTEND TIME TO FILE SPECIAL REPORT AND ANSWER

COMES NOW the Defendant, Prison Health Services, Inc. and moves this Honorable Court to extend the time period in which it has to provide a Special Report and Answer in this matter, and in support of this motion shows as follows:

1. The Plaintiff, John Inman, has sued Defendant Prison Health Services, Inc. for failing to properly treat injuries he sustained in an automobile accident while incarcerated at Draper Correctional Facility.
2. The Plaintiff was treated for his injuries at neighboring Staton Correctional Facility.
3. The Medical Director who was serving at Staton during the time the Plaintiff allegedly suffered injury is now serving as Medical Director for Tutwiler Correctional Facility.
4. As a result of Dr. Williams' transfer and scheduling difficulties inherent with Dr. Williams' practice, it will be impossible for Defense counsel to meet with

Dr. Williams by August 29, 2005 in order to prepare a timely response pursuant to this Court's July 19, 2005 Order.

WHEREFORE, Defendant requests that this Honorable Court grant it a fifteen (15) day extension up to and including September 13, 2005 so that this Defendant may file a responsive Answer and Special Report in compliance with this Court's Order. None of the parties to this matter will be prejudiced by this brief extension of time.

Respectfully submitted,

s/L. Peyton Chapman, III
Alabama State Bar Number CHA060
s/R. Brett Garrett
Alabama State Bar Number GAR085
Attorneys for Defendant Prison
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CERTIFICATE OF SERVICE

I hereby certified that I have mailed via U S. mail, properly addressed and first-class postage prepaid, the foregoing document this the 23rd day of August, 2005, to the following:

John Inman AIS#234821
Frank Lee Youth Center
P.O. Box 220410 Dorm 1-70
Deatsville, AL 36022

s/R. Brett Garrett
Alabama State Bar Number GAR085